

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION**

CITY OF BRISTOL, VIRGINIA

Plaintiff/Counterclaim Defendant,

V.

BVU AUTHORITY,

Defendant/Counterclaim Plaintiff.

Civil Action No. 1:20-cv-00041-JPJ-PMS

**JOINT STIPULATION OF VOLUNTARY DISMISSAL OF CLAIMS AND
COUNTERCLAIMS WITH PREJUDICE PURSUANT TO RULE 41(a)(1)(A)(ii)**

Plaintiff/Counterclaim Defendant the City of Bristol, Virginia (the “City”), and Defendant/Counterclaim Plaintiff BVU Authority (“BVU”), by their undersigned counsel, hereby notify the Court of the dismissal with prejudice of all claims and counterclaims asserted in these proceedings as follows:

1. The City, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), hereby dismisses with prejudice all counts asserted against the BVU in its Complaint (ECF No. 1-1).
2. BVU, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), hereby dismisses with prejudice all counts asserted against the City in its Counterclaim (ECF No. 3).
3. All claims and counterclaims are thus dismissed with prejudice each side to bear its own costs, expenses, and attorney's fees.

Pursuant to Fed. R. Civ. P. 41(a)(1)(A), this Notice of Dismissal does not require a Court Order. The Clerk of Court is respectfully requested to note this lawsuit as CLOSED.

AND THIS CAUSE IS ENDED

CITY OF BRISTOL, VIRGINIA

/s/ Alexander H. Berman
Alexander H. Berman (VSB No. 89008)
Alan M. Freeman (*Pro Hac Vice*)
BLANK ROME LLP
1825 Eye Street, N.W.
Washington, D.C. 20006
Tel: (202) 420-2200
Fax: (202) 572-1429
Alex.Berman@BlankRome.com
Alan.Freeman@BlankRome.com

Randall C. Eads (VSB No. 77871)
City Attorney
300 Lee Street, #202
Bristol, VA 24201
Tel: (276) 645-7333
CityAttorney@BristolVA.org

*Counsel for Plaintiff/Counterclaim
Defendant, City of Bristol, Virginia*

BVU AUTHORITY

/s/ Cameron S. Bell
Cameron S. Bell (VSB No. 47685)
PENN, STUART & ESKRIDGE
P.O. Box 2288
Abingdon, VA 24212-2288
Tel: (276) 628-5151
Fax: (276) 628-5621
CBell@PennStuart.com

*Counsel for Defendant/Counterclaim
Plaintiff, BVU Authority*

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of March, 2024, I filed the foregoing Joint Stipulation of Voluntary Dismissal of Claims and Counterclaims With Prejudice Pursuant to Rule 41(a)(1)(a)(ii) using the Court's CM/ECF system, which will send notice of this filing to counsel of record.

/s/Cameron S. Bell
Cameron S. Bell